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June 26, 2019

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By ECF Filing
The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: United States v. Michael L. Cohen, 17 CR 544 (NGG)

Dear Judge Garaufis:

We represent defendant Michael Cohen in connection with the above-referenced case. This letter is submitted to request a temporary modification of Mr. Cohen's bail conditions to permit him to travel on two occasions in the coming months. The government has no objection to this request.

As the Court will recall, Mr. Cohen was arraigned and released on bail in June 2018. Under the bail terms set by the Court, Mr. Cohen was permitted to return home to London, England to live during the pendency of the case and while in the U.S., is allowed to travel within the Eastern and Southern Districts of New York and the Districts of Maine and Massachusetts. Since then, he has returned to the U.S. on multiple occasions for court appearances in this case. In addition, in February 2019, the Court, with the government's consent, permitted Mr. Cohen to take a family vacation in France. On May 15, 2019, Mr. Cohen entered a guilty plea to a single count of making a false statement in an interview with the FBI. His sentencing is scheduled for September 20, 2019.

Mr. Cohen would like to request the Court's permission to travel on two occasions this summer. First, Mr. Cohen's daughter will be attending a tennis camp in Mallorca, Spain and he would like to travel there to pick her up at the conclusion of the camp. He would plan to fly directly from London to Mallorca on July 13 and return to London with his daughter the same day. Second, Mr. Cohen would like to travel to Sardinia, Italy for a vacation from August 5 through August 15. He would plan to fly directly from London to Sardinia and back. We respectfully request that the Court order a temporary modification of Mr. Cohen's bail conditions to permit him to take these trips. As noted above, we have advised the

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prosecutors handling this case of this request, and the government has no objection to the request.

Respectfully submitted,

Ronald G. White

cc: Government counsel (by ECF)

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Applications granted.

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s/Nicholas G. Garaufis

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